

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 21-
v.	:	DATE FILED: December 23, 2021
WASIM SHAZAD	:	VIOLATIONS:
	:	18 U.S.C. §§ 1956(a)(3)(B), (C)
	:	(money laundering – sting – 2 counts)
	:	31 U.S.C. § 5324(b)(1) (failure to file
	:	record of financial transaction – 2 counts)
		Notice of forfeiture

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Defendant WASIM SHAZAD was the sole operator of a jewelry store, V Jewelers, located at 735 Sansom Street, Philadelphia, Pennsylvania.
2. On or about June 5, 2018, at V Jewelers, defendant WASIM SHAZAD sold a woman’s platinum and diamond necklace, with 16.56 total diamond carat weight, for \$24,000 in cash to an undercover officer (“the UCE”) with the Internal Revenue Service (“IRS”), who represented to defendant SHAZAD that his source of income was the sale of illegal drugs.
3. As of December 21, 2021, defendant WASIM SHAZAD had not filed an IRS Form 8300 for the \$24,000 cash payment from the UCE on June 5, 2018.

4. On or about June 5, 2018, in the Eastern District of Pennsylvania, defendant

WASIM SHAZAD

with the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity and to avoid a transaction reporting requirement under state or federal law, did knowingly and intentionally conduct a financial transaction, namely the sale of a platinum and diamond necklace for \$24,000, involving property represented by a law enforcement officer to be the proceeds of a specified unlawful activity, specifically distribution of illegal narcotics, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(3)(B), (a)(3)(C).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are incorporated by reference.

2. From on or about June 5, 2018, to on or about December 21, 2021, in the Eastern District of Pennsylvania, defendant

WASIM SHAZAD

in connection with a transaction at V Jewelers, relating to the sale of a woman's platinum and diamond necklace, with 16.56 total diamond carat weight to an undercover officer, received \$24,000 in cash and was required by law, pursuant to Title 31, United States Code, Section 5331, and the regulations promulgated thereunder, to file with the Financial Crimes Enforcement Network, within 15 days of his receipt of the \$24,000, an IRS Form 8300 in the manner and form stated thereon, stating, among other things, the name and address of the person from whom he received the cash; the amount of cash received; and the date and nature of the transaction. Knowing all of the foregoing facts, and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331, defendant SHAZAD willfully caused V Jewelers to fail to supply the information and fail to file the required form.

In violation of Title 31, United States Code, Section 5324(b)(1).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count One is incorporated by reference.
2. On or about August 14, 2018, at V Jewelers, defendant WASIM SHAZAD sold a 2.01 carat canary diamond and platinum ring, for \$23,000 in cash to an undercover officer (“the UCE”) with the Internal Revenue Service (“IRS”), who represented to defendant SHAZAD that his source of income was the sale of illegal drugs.
3. As of December 21, 2021, defendant WASIM SHAZAD had not filed an IRS Form 8300 for the \$23,000 cash payment from the UCE on August 14, 2018.
4. On or about August 14, 2018, in the Eastern District of Pennsylvania, defendant

WASIM SHAZAD

with the intent to conceal and disguise the nature, location, source, ownership and control of property believed to be the proceeds of specified unlawful activity and to avoid a transaction reporting requirement under state or federal law, did knowingly and intentionally conduct a financial transaction, namely the sale of a 2.01 carat canary diamond and platinum ring for \$23,000, involving property represented by a law enforcement officer to be the proceeds of a specified unlawful activity, specifically distribution of illegal narcotics, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 1956(a)(3)(B), (a)(3)(C).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraph 1 of Count One and paragraphs 2 and 3 of Count Three are incorporated by reference.

2. From on or about August 14, 2018, to on or about December 21, 2021, in the Eastern District of Pennsylvania, defendant

WASIM SHAZAD

in connection with a transaction at V Jewelers, relating to the sale of a 2.01 carat canary diamond and platinum ring to an undercover officer, received \$23,000 in cash and was required by law, pursuant to Title 31, United States Code, Section 5331, and the regulations promulgated thereunder, to file with the Financial Crimes Enforcement Network, within 15 days of his receipt of the \$23,000, an IRS Form 8300 in the manner and form stated thereon, stating, among other things, the name and address of the person from whom he received the cash; the amount of cash received; and the date and nature of the transaction. Knowing all of the foregoing facts, and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5331, defendant SHAZAD willfully caused V Jewelers to fail to supply the information and fail to file the required form.

In violation of Title 31, United States Code, Section 5324(b)(1).

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1956, set forth in this superseding indictment, defendant

WASIM SHAZAD

shall forfeit to the United States of America any property, real or personal, involved in such violation, and any property traceable to such property, including, but not limited to, the sum of \$47,000 in United States currency.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A handwritten signature in blue ink, appearing to read "Ronald Sarach for". The signature is fluid and cursive.

**JENNIFER ARBITTIER WILLIAMS
UNITED STATES ATTORNEY**

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

v.

WASIM SHAZAD

INFORMATION

18 U.S.C. §§ 1956(a)(3)(B), (C) (money laundering – sting – 2 counts); 31 U.S.C. § 5324(b)(1) (failure to file record of financial transaction - 2 counts); Notice of forfeiture

A true bill.

Foreman

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Clerk

Bail, \$ _____